III. REMARKS

1.   Claims 1, 7, 14, and 15 are amended. Claims 1-15 are presented for further consideration.

2.   Claims 1-15 stand rejected under 35USC103(a) based on the reference Rivette, U.S. Patent No.5,623,679 in view of the reference Warnock, et al, U.S. Patent No. 5,634,064. The Examiner is respectfully requested to reconsider his rejection in view of the above amendments and the following remarks.

The rejection is traversed for the following reason:

The combined teaching of the reference Rivette in view of the disclosure of Warnock does not render claims 1-15 obvious because the combined teachings fail to teach or otherwise suggest each and every limitation of the claims. It is well established that to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 U.S.P.Q. 580 (C.C.P.A. 1974). *See also In re Wilson*, 165 U.S.P.Q. 494 (C.C.P.A. 1970).

The disclosure of the cited reference Rivette describes a system that provides software for synchronizing a text file with an image file to produce an equivalent file. The equivalent file is a text file with pagination coordinated with the image file (see column 3, lines 38-40). The software drives a display such that the equivalent text file and the image file are displayed on adjacent screens. The Examiner assertion that this teaches "dividing the display into a navigation screen and a read screen" is incorrect. Each of the displays of Rivette are

navigable and readable. The displays of Rivette are not separated by navigation and reading functions.

It is clear from the language of the claims that the display in the subject application is divided into adjacent screens, each of which displays <u>text</u>. One screen allows navigation through an entire document text file (overall view), the other screen displays a selected portion of the navigation screen to facilitate reading (read pane). Both screens display the same text with the selected portion limited to allow a more readable size.

The problem to which Rivette is directed is to facilitate the location of material in an image file in a text file. This is a particular problem that arises in the United States Patent & Trademark Office internet accessible database, where a patent may be displayed as text without figures or as images (graphic content) with the text and figures displayed in the standard printed format of a US Patent. In this context, it is difficult to find and select text in the text file, after the text is located in the image file. The equivalent file of Rivette coordinates the two files for ease of finding content in the image file and locating the same content in the "equivalent" text file (see column 3, lines 38-40 and also column 4, lines 8-12). The differences in display function in Rivette are further illustrated by the fact that the displays of Rivette are not necessarily related and can be from completely different files (see column 4, lines 3-8).

The claimed subject matter of this application is directed to enabling a user to read text on a small display. There is no conversion of a text file to be synchronous with an image file. Text passages are selected using "basic rules of syntax" for sequential viewing of connected text on a "read" pane.   The independent claims of this application are amended to clarify that it is portions of connected text that is sequentially displayed on the read pane.

The Examiner continues to insist that the Patent Section headings, pages, or just numbers are in some way similar to "language specific rules of syntax". First the selection characteristics of Rivette are independent of language and second the selection characteristics do not identify sequential portions of a text for display on an adjacent screen. The selection characteristics upon which the Examiner relies are used in navigation through the equivalent or image view not for determining what is contained on the adjacent screen. The language of independent claims, therefore, distinguish over Rivette no matter how broadly the claims of this application are interpreted.

The Examiner has cited the reference Warnock as teaching a scrolling function that provides a similar result as selecting a start element and an end element on the basis of rules of syntax. The scrolling in Warnock is a manual manipulation by the user of a computer. It does not teach anything with regard to sequential selection of portions of connected text based on language rules of syntax.

Warnock is directed to an electronic document viewer that is adapted for viewing in different modes including a normal view and an article view. In the article view, a portion of the document is enhanced to facilitate reading. There is no disclosure of a navigation pane and a read pane as there is only one display. In addition there is no suggestion that a read pane may be adapted to display sequential textual content selected according to language specific rules of syntax.

Claim 1, as amended, states:

"storing language specific rules of syntax in a memory;

sequentially processing the text, based on the stored language specific rules of syntax, to identify a start element and end element,

selecting a first text portion between the start element and end element as the reading portion and placing the selected portion on the read pane, and

further processing connected portions of the selected text for a new start element and a new end element and selecting the text portion between the new start element and new end element of a second text portion contiguous to said first text portion for display as the next reading portion and placing the selected contiguous portion on the read pane, if a shift command is received."

Amended claims 7, 14, and 15 contain equivalent language.

The combined teaching of the cited references Rivette and Warnock, considered either alone or in combination, fail to disclose or suggest these claim elements. The teaching of Warnock fails to remedy the deficiencies of Rivette.

It is well settled that in order to establish a prima facie case for obviousness, the prior art references must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, without reference to the disclosure of this application.

The reference Rivette does not teach dividing the display into a navigation pane and a read pane, nor does it mention anything about searching for start
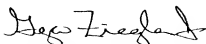
elements and end elements based on language specific rules of syntax. Warnock does not remedy these deficiencies. Applicant submits that the modification of the teachings of Rivette and Warnock in order to obtain the invention, as described in the claims submitted herein, would not have been obvious to one skilled in the art. Also, there is no indication that such a modification would be desirable.

The above arguments apply equally to the rejected dependent claims.

For all of the above reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

28 September 2007
_____   _____
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